

**DEPARTMENT OF CONSERVATION****DIVISION OF LAND RESOURCE PROTECTION**

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July 13, 2005

Mr. Paul Dabbs
Statewide Planning Branch
California Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236-0001

Subject: Public Review of the California Public Review Draft of the California Water Plan

Dear Mr. Dabbs:

The Department of Conservation's Division of Land Resource Protection (Division) monitors farmland conversion on a statewide basis and administers the California Land Conservation (Williamson) Act, California Farmland Conservancy Program, and other agricultural land conservation programs.

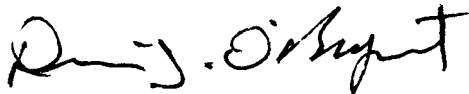
Volume 2, Chapter 2 of the Water Plan entitled Resource Management Strategies, Agricultural Lands and Stewardship provides an incomplete and inaccurate discussion of resources that are available. The Chapter includes a brief statement pertaining to the Williamson Act, but fails to mention that the Division administers the program at the state level, and fails to mention the Division's California Farmland Conservancy Program. The final document should be amended to correct these oversights. Page 7, under Recommendations, also contains some incorrect information. DOC does not have a Watershed Coordinator, but does administer the Watershed Grant Coordinator Program. It also administers the Resource Conservation District Assistance Program. Information pertaining to these programs is readily available on the Department's website <http://www.conservation.ca.gov>. Also, is the document referring to the California Conservation Partnership Program instead of the California RCD Cooperative? We would be more than willing to provide additional information regarding the Department's statutory authority and administration of the Williamson Act, as well as provide assistance in completing this section of the Water Plan.

Chapter 5 of the Strategic Planning portion is comprised of an implementation plan and includes performance measures. Table 5.1 provides a narrative regarding performance

measures. If a performance measure is to provide a method for accountability, then the presentation of the measures included in the update should be revisited, as the performance measures are not specific. In order to measure progress how many groundwater management plans, urban water management plans drought contingency plans and integrated water management plans will be distributed, prepared, adopted is really only a method of tallying outputs, not measuring outcomes. How is progress in meeting actions under the California Urban Water Conservation Council and the Agricultural Water Management Council to be measured? Which actions are to be met, and within what timeframe? How much funding is to be dedicated for CALFED Bay Delta Program, local technical and financial assistance, etc.? For example when incorporating specific performance measures, such as, "Adopt 30 groundwater management plans" in critical identified areas, provides an effective tracking of progress in implementation, and incorporates accountability in its implementation. As the Strategic Planning effort appears to be essentially a vision statement, perhaps the lead agency should consider omitting or deleting performance standards, unless there is a mechanism in place to ensure that these will be accounted for.

Thank you for the opportunity to review the Draft Water Plan. Please do not hesitate to contact Jeannie Blakeslee should you have any questions regarding these comments at (916) 323-4943. Again, we would be pleased to meet with you and provide assistance and additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Dennis J. O'Bryant". The signature is fluid and cursive, with the first name "Dennis" and last name "O'Bryant" clearly distinguishable.

Dennis J O'Bryant
Acting Assistant Director